

ADDENDUM TO THE FACT SHEET
FOR STATE WASTE DISCHARGE
PERMIT NO. ST 6197
June 2010

I. GENERAL INFORMATION

Facility: Sorenson Transport Company, Inc.
632 Northwest Averill Street
Chehalis, WA 98532

II. APPLICATION REVIEW

Sorenson Transport submitted an application to Ecology on December 30, 2008, for permit reissuance, and Ecology accepted it on January 14, 2009. Ecology has sufficiently reviewed the application, discharge monitoring reports, and other facility information in enough detail to ensure that:

- Sorenson Transport has complied with all of the terms, conditions, requirements and schedules of compliance of the expired permit after upgrading the treatment system, operating and maintenance procedures in accordance with the Ecology Administrative Order 4417 issued in September 2007. Please refer to Appendix B for detailed descriptions.
- Ecology has up-to date information on Sorenson Transport Company's waste treatment practices; and the nature, content, volume, and frequency of its discharge.
- The discharge meets applicable effluent standards and limits, and other legally applicable requirements.

III. PERMIT REAUTHORIZATION

When Ecology reauthorizes a discharge permit it essentially reissues the permit with the existing limits, terms and conditions. Alternatively, when Ecology renews a permit it re-evaluates the impact of the discharge on the City of Chehalis publicly owned treatment plant (POTW) which may lead to changes in the limits, terms and conditions of the permit.

This fact sheet addendum accompanies the permit, which Ecology proposes to reauthorize for the discharge of Sorenson's wastewater to City of Chehalis POTW. The previous fact sheet explains the basis for the discharge limitations and conditions of the reauthorized permit and remains as part of the administrative record.

Ecology determined it does not need to change the existing permit requirements, including discharge limits and monitoring, to protect the publicly owned treatment works (POTW). The previous fact sheet addressed conditions and issues at the facility at the time when Ecology issued the previous permit in 2005. Since the issuance of the current permit and after the 2007 treatment system upgrade, Ecology has not received any additional information, which indicates that environmental impacts from the discharge warrant a complete renewal of the permit. The reauthorized permit is virtually identical to the previous permit issued on January 7, 2005 except the monitoring schedule requirement.

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Ecology reviewed inspections and assessed compliance of Sorenson Transport's discharge with the terms and conditions in the previous permit and determined that it should not rank the facility as a high priority for permit renewal. Ecology assigns a high priority for permit renewals in situations where the POTW would benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, along with the renewal of high priority permits, allows Ecology to reissue permits in a timely manner and minimize the number of active permits that have passed their expiration dates. For permit reissuance planning purposes, Ecology follows a system of ranking that considers the benefit gained by renewing a permit rather than reauthorizing a permit during its annual permit planning process. Ecology assesses each permit that is expiring and due for reissuance and compares it with other permits due for reissuance. Ecology notifies the public and seeks input after it has tentatively established the initial draft ranking of the permits it plans to renew and those it plans to reauthorize. Ecology considers all relevant comments and suggestions before it makes a final decision.

Ecology carried over the discharge limits and conditions in effect at the time of expiration of the previous permit to this reauthorized permit. Ecology only changed the submittal dates for reports from those in the previous permit. Ecology removed the completed report requirements that do not require additional or continued assessment. It adjusted the dates for the other standard compliance and submittal requirements that it carried over from the past permit into this reauthorized permit. Ecology considered these reports necessary in the previous permit and no information has come forward to cause it to reconsider.

Ecology must public notice the availability of the draft reauthorized permit at least 30 days before it reissues the permit [Washington Administrative Code (WAC) 173-220-050]. Ecology invites you to review and comment on its decision to reauthorize the permit (see Appendix A-Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, Ecology will prepare a response to comments document that it will attach to this fact sheet addendum. The response to comments will include the resultant changes to the permit and either address each comment individually or summarize the substantive comments and respond. Ecology sends a copy of the response to comments to all parties who submitted comments. Ecology will include the response to comments in this fact sheet addendum.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

Ecology proposes to reissue this permit for five years.

APPENDIX A--PUBLIC INVOLVEMENT INFORMATION

Ecology proposes to reissue a permit to Sorenson Transport. The permit includes wastewater discharge limits and other conditions. This fact sheet addendum describes the facility and Ecology's reasons for reauthorizing the permit conditions.

Ecology placed a Public Notice of Application on June 4, 2009, and June 11, 2009, in the *Chronicle* to inform the public about the submitted application and to invite comment on the reissuance of this permit.

Ecology will place a Public Notice of Draft on June 9, 2010, in the *Chronicle* to inform the public and to invite comment on the proposed draft State Waste Discharge permit and fact sheet addendum.

The Notice –

- Tells where copies of the draft Permit and Fact Sheet are available for public evaluation (a local public library, the closest Regional or Field Office, posted on our website.).
- Offers to provide the documents in an alternate format to accommodate special needs.
- Urges people to submit their comments, in writing, before the end of the Comment Period
- Tells how to request a public hearing of comments about the proposed State Waste Discharge Permit.
- Explains the next step(s) in the permitting process.

Ecology has published a document entitled **Frequently Asked Questions about Effective Public Commenting** which is available on our website at <http://www.ecy.wa.gov/biblio/0307023.html>.

You may obtain further information from Ecology by telephone, 360-407-6280, or by writing to the permit writer at the address listed below.

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

The primary author of this permit and fact sheet is **Gary Lee**

Appendix B

Ecology issued the previous permit on January 7, 2005, that became effective on July 1, 2005. The facility had difficulties in meeting its Zinc limit in 2006 and 2007 as shown in Table 1.

Table 1, Sorenson Transport Non-Compliance

As the result of the non-compliance, Ecology issued Administrative Order 4416 on June 6, 2007, requiring the facility to implement the following corrective actions:

DMR Date	Parameter	Unit	Value Type	Value	Max
1-Mar-06	Zinc	MG/L	AVG	2.2	1.4
1-Mar-06	Zinc	MG/L	MXD	2.2	1.4
1-Jul-06	Zinc	MG/L	AVG	1.47	1.4
1-Jul-06	Zinc	MG/L	MXD	1.47	1.4
1-Jan-07	Zinc	MG/L	AVG	2.99	1.4
1-Jan-07	Zinc	MG/L	MXD	2.99	1.4
1-Oct-06	Zinc	MG/L	AVG	2.12	1.4
1-Oct-06	Zinc	MG/L	MXD	2.12	1.4
1-Apr-07	Oil & Grease	MG/L	AVG	150	100
1-Apr-07	Oil & Grease	MG/L	MXD	150	100
1-Mar-07	Zinc	MG/L	AVG	2	1.4
1-Mar-07	Zinc	MG/L	MXD	2	1.4
1-Sep-07	Zinc	MG/L	AVG	2.05	1.4
1-Sep-07	Zinc	MG/L	MXD	2.05	1.4

- Corrective Action 1: Complete a pilot study on the wastewater treatment system for enhanced removal of solids and total Zinc by June 30, 2007.
- Correction Action 2: Complete the installation and start operating the upgraded system by September 30, 2007.
- Corrective Action 3: Comply with the average monthly and maximum Zinc limits by September 30, 2007.

Sorenson completed the pilot study and upgraded the treatment system by:

- Adding settling and filtering capacity.
- Increasing the maintenance frequency of the treatment system.
- Replacing the two-part soap system (acid wash followed by alkaline rinse) with a one-step alkaline cleaner to minimize metals released from the acid washing process

The facility has not violated its zinc limits since it completed the system upgrade/modification in September 2007 as shown in Table 1.

Based on the facility's continuous compliance after the system upgrade, Ecology reduced the wastewater monitoring requirement from monthly to quarterly.